

EXHIBIT B

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE
- - -

4 IN RE: VALSARTAN, : MDL NO. 2875
5 LOSARTAN, AND :
6 IRBESARTAN PRODUCTS : CIVIL NO.
7 LIABILITY LITIGATION : 19-2875
8 : (RBK/JS)
9 :
10 THIS DOCUMENT APPLIES : HON. ROBERT
11 TO ALL CASES : B. KUGLER
12 - CONFIDENTIAL INFORMATION -
13 SUBJECT TO PROTECTIVE ORDER
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1 bit of experience and the fact that you
2 went to New Jersey Institute of
3 Technology. Is that -- what we were
4 provided, was that the most up-to-date
5 LinkedIn profile?

6 A. Could you please repeat your
7 question?

8 Q. Did you provide us your most
9 recent LinkedIn profile?

10 A. No, I did not.

11 Q. Somebody provided us a
12 LinkedIn profile for you. Do you know
13 who did that?

14 A. I do not know.

15 Q. Request Number 2 asked if
16 you had any documents to produce that
17 were not produced previously. Are there
18 any documents that are being produced in
19 connection with this deposition in
20 response to this deposition notice?

21 A. I keep all my relevant
22 documents and information according to
23 the court order.

24 Q. And what is your

1 understanding as to what -- how you were
2 supposed to keep those documents pursuant
3 to the court order?

4 A. I'm supposed to keep all the
5 relevant documents.

6 Q. When did you first find out
7 that you had to hold your documents and
8 not delete or destroy anymore?

9 A. That was since I received
10 the notification from my counsel.

11 Q. What day was that?

12 A. I do not recall the exact
13 date.

14 Q. What year was it?

15 A. I'm not sure about that
16 either, but I believe it was in 2018.

17 Q. You said when your lawyer
18 told you or your counsel told you. Which
19 counsel are you talking about?

20 A. Seth.

21 Q. What type of computer or
22 computers do you use in your work?

23 A. I used my desktop computer
24 and my personal computer.

1 MR. SLATER: There was a
2 back -- a feedback. I couldn't
3 understand the answer, Dr. Shao.

4 THE WITNESS: I used my
5 desktop computer and my personal
6 computer.

7 BY MR. SLATER:

8 Q. The desktop, where is that
9 located?

10 A. The desktop computer is
11 located in my office at Princeton.

12 Q. What address is that?

13 A. 700 Atrium Drive, Somerset,
14 New Jersey.

15 The current address is
16 700 Atrium Drive, 2nd Floor, Somerset,
17 New Jersey. Zip code is 08520.

18 Sorry, I just provided the
19 incorrect zip code. Let me make a
20 correction. It's 08873 rather.

21 Q. What type of desktop --
22 rephrase.

23 What manufacturer or brand
24 of desktop computer is that?

1 A. I'm not sure. It was
2 installed for me by my IT staff.

3 Q. How long have you had it?

4 A. I believe it has been there
5 for two to three years also.

6 Q. Did you have another desktop
7 computer before that at Princeton?

8 A. There used to be another
9 desktop computer that I used the same
10 hard disc -- or hard drive.

11 Q. Do you mean the hard drive
12 from the prior computer was brought
13 forward and used with the new computer?

14 A. That is what my IT staff
15 told me.

16 Q. Do you know if that hard
17 drive was swept and the documents and
18 information were provided to us?

19 A. When it comes to my desktop
20 computer, the sweeping was arranged to be
21 done by third party through our consult.

22 Q. Have you maintained hardcopy
23 documents regarding your work?

24 A. No, I haven't.

1 Q. Do you have an office in
2 China, at any of ZHP's offices in China?

3 A. No, I don't.

4 Q. Do you have a laptop
5 computer?

6 A. That is correct, I do.

7 Q. Do you use the laptop for
8 work?

9 A. That is correct. I do use
10 my personal laptop computer for work.

11 Q. Was that laptop -- rephrase.
12 What brand of laptop is it?

13 A. It is an Apple MacBook.

14 Q. How long have you had that
15 laptop?

16 A. I believe I have been using
17 it since 2015 also. I do not recall the
18 exact year.

19 Q. Was that laptop provided to
20 the third party that swept the --
21 rephrase.

22 Was that laptop provided to
23 the third party so the documents and
24 information could be provided to us?

1 A. That is correct.

2 Q. Do you have a smartphone
3 that you use for work?

4 A. That is correct.

5 Q. What type?

6 A. It's an iPhone Model 8.

7 Q. How long have you had that?

8 A. I do not recall how long I
9 been using it. I believe I started in
10 2016 also.

11 Q. Was that iPhone provided to
12 the third party vendor to pull off
13 documents or information for us?

14 A. No.

15 Q. Did anybody ask you for it
16 from work -- rephrase.

17 Did any attorneys or --
18 rephrase.

19 Did anybody ask you for the
20 iPhone so that it could be evaluated so
21 documents and information could be
22 provided to us?

23 A. No.

24 MR. SLATER: I don't know

1 e-mails between June 4, 2018, and
2 June 12, 2018?

3 A. Can you repeat your
4 question?

5 Q. Yeah. Did you send or
6 receive any e-mails related to your work
7 between June 4, 2018, and June 12, 2018?

8 A. I do not recall. I do not
9 know what type of e-mails you're
10 referring to either.

11 Q. Any e-mails having to do
12 with work.

13 A. I don't know because I
14 didn't keep track of that.

15 I already kept all the
16 e-mails but I do not recall, because it
17 was long time ago.

18 Q. Do you keep a calendar?

19 A. No.

20 Q. Do you use Outlook to keep
21 track of your appointments?

22 A. I never, ever used Outlook
23 before.

24 Q. Do you write down your

1 schedule on a piece of paper?

2 A. I don't do such a thing.

3 Q. How do you keep track of
4 your schedule without any sort of a
5 calendar whatsoever?

6 A. In general my secretary
7 would inform me of any meeting in my
8 e-mail.

9 Q. Who is your secretary?

10 A. Shi-shi Ouyang, spelled as
11 O-U-Y-A-N-G, as her last name.

12 Q. Where does she work, what
13 office?

14 A. In the office of Princeton in
15 New Jersey.

16 Q. Was that true in June of
17 2018 that she would keep track of your
18 calendar and your schedule?

19 A. I do not know.

20 Q. How long has she worked for
21 you?

22 A. For about two years.

23 Q. Do you know when she started
24 with you?